

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

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THE ESTATE OF JASON THOMSON,

Plaintiff,

v.

Case No. 23-CV-00084-WCG

CHRISTOPHER VAUBEL, et al.,

Defendants,

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**DECLARATION OF KEVIN G. RAASCH**

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I, Kevin G. Raasch, declare pursuant to 28 U.S.C. Section 1746, under penalty of perjury that the following is true and correct:

1. I am an attorney licensed to practice law in the State of Wisconsin.
2. I am employed at the law firm Katers & Granitz, LLC, and one of the attorneys retained to represent the plaintiff in this action.
3. I have personal knowledge of the facts asserted and make this declaration in support of Plaintiff's Proposed Findings of Additional Facts in Opposition to City of Green Bay Defendants' Motion for Summary Judgment and the Plaintiffs' Responses to City of Green Bay Defendants' Proposed Findings of Fact and Motion for Summary Judgment.
4. Pursuant to General L. R. 26, the exhibits identified and attached to this declaration and their assigned exhibit numbers have remained consistent throughout this action.
5. Attached as **Exhibit 6** is a true and correct copy of the Brown County Sheriff's Office Admissions Policy MJ2.
6. Attached as **Exhibit 13** is a true and correct copy of Cpl. Kayla Kuchta's 2/10/2020 Statement Form.

7. Attached as **Exhibit 15** is a true and correct copy Cpl. Matthew West's 2/10/2020 Statement Form.
8. Attached as **Exhibit 18** is a true and correct copy of Clint Pelischek's 2/10/2020 Statement Form.
9. Attached as **Exhibit 22** is a true and correct copy of the Wisconsin Division of Criminal Investigation Interview Report with Christopher Vaubel.
10. Attached as **Exhibit 23** is a true and correct copy of the Green Bay Police Department Policy 434 Medical Aid and Response.
11. Attached as **Exhibit 24** is a true and correct copy of the Green Bay Police Department Policy 302 Handcuffing and Restraints and WRAP Attachment.
12. Attached as **Exhibit 25** is a true and correct copy of St. Vincent's Law Enforcement Request for Medical Clearance Form for Thomson.
13. Attached as **Exhibit 26** is a true and correct copy of the Green Bay Police Department Policy 300 Use of Force.
14. Attached as **Exhibit 28** is a true and correct copy of the Wisconsin Division of Criminal Investigation Interview Report with Karen Pineda.
15. Attached as **Exhibit 30** is a true and correct copy of the Wisconsin Division of Criminal Investigation Interview Report with Thomas Behn
16. Attached as **Exhibit 31** is a true and correct copy of the Green Bay Police Department Care Report.
17. Attached as **Exhibit 32** is a true and correct copy of the Wisconsin Division of Criminal Investigation Examination of Sgt. Behn Squad Video.
18. Attached as **Exhibit 36** is a true and correct copy of the Wisconsin Division of Criminal

Investigation Interview Report with Michael O'Donnell.

19. Attached as **Exhibit 37** is a true and correct copy of Thomson's Booking Form.

20. Attached as **Exhibit 40** is a true and correct copy of the Wisconsin Division of Criminal Investigation Interview Report with Ben Harvath.

21. Attached as **Exhibit 41** is a true and correct copy of The WRAP Basic Application Manual.

22. Attached as **Exhibit 43** is a true and correct copy of the Wisconsin Division of Criminal Investigation Interview Report with Alex Wanish.

23. Attached as **Exhibit 45** is a true and correct copy of the written statement submitted by Nurse Warren on February 10, 2020.

24. Attached as **Exhibit 46** is a true and correct copy of the condensed Deposition Transcript of Michael O'Donnell taken on October 26, 2023, in this case.

25. Attached as **Exhibit 47** is a true and correct copy of the condensed Deposition Transcript of Scott Delsart taken on October 26, 2023, in this case.

26. Attached as **Exhibit 48** is a true and correct copy of the condensed Deposition Transcript of Thomas Behn taken on October 26, 2023, in this case.

27. Attached as **Exhibit 49** is a true and correct copy of the condensed Deposition Transcript of Christopher Vaubel taken on October 23, 2023, in this case.

28. Attached as **Exhibit 50** is a true and correct copy of the condensed Deposition Transcript of Karen Pineda taken on October 23, 2023, in this case.

29. Attached as **Exhibit 51** is a true and correct copy of the condensed Deposition Transcript of Matthew West taken on October 4, 2023, in this case.

30. Attached as **Exhibit 52** is a true and correct copy of the condensed Deposition Transcript of Clint Pelischek taken on October 4, 2023, in this case.

31. Attached as **Exhibit 53** is a true and correct copy of the condensed Deposition Transcript of Bryce Haines taken on October 4, 2023, in this case.
32. Attached as **Exhibit 54** is a true and correct copy of the condensed Transcript of Adam Schartner taken on October 3, 2023, in this case.
33. Attached as **Exhibit 55** is a true and correct copy of the condensed Deposition Transcript of Kayla Kuchta taken on October 3, 2023, in this case.
34. Attached as **Exhibit 56** is a true and correct copy of the condensed Deposition Transcript of Rebecca Warren taken on November 7, 2023, in this case.
35. Attached as **Exhibit 57** is a true and correct copy of the condensed Deposition Transcript of Benjamin Harvath taken on October 27, 2023, in this case.
36. Attached as **Exhibit 60** is a true and correct copy of the Wisconsin Investigation Interview Case Report with Ron Skaleski.
37. Attached as **Exhibit 61** is a true and correct copy of the GBPD Squad Car 13 Backseat video.
38. Attached as **Exhibit 62** is a true and correct copy of the GBPD Squad Car 6 Front video from 2/10/2020.
39. Attached as **Exhibit 63** Is a true and correct copy of the 911 call from St. Vincent regarding Thomson.
40. Attached as **Exhibit 64** is a true and correct copy of the St. Vincent South Hall security video from 2/10/2020.
41. Attached as **Exhibit 65** is a true and correct copy of the St Vincent East Hall Security Video from 2/10/2020.
42. Attached as **Exhibit 66** is a true and correct copy of the BCJ Arresting Counter Security

Video from 2/10/2020.

43. Attached as **Exhibit 67** is a true and correct copy of the BCJ Arresting Area S19A Security

Video from 2/10/2020.

44. Attached as **Exhibit 68** is a true and correct copy of the BCJ Arresting Area L1 Security

Video from 2/10/2020.

45. Attached as **Exhibit 69** is a true and correct copy of the BCJ Sally Port Interior 1 Security

Video from 2/10/2020.

46. Attached as **Exhibit 70** is a true and correct copy of the Brown County Medical Examiner's

Report of Jason Thomson.

47. Attached as **Exhibit 71** is a true and correct copy of Jason Thomson's Medical Records

from Aurora Baycare.

48. Attached as **Exhibit 74** is a true and correct copy of Kenneth Stein's Expert Report in this

case.

49. Attached as **Exhibit 75** is a true and correct copy of WDCI Report Bates GB4-6.

50. Attached as **Exhibit 78** is a true and correct copy of Thomson's medical records turned

over in discovery by Nurse Warren. (Bates CS 005;106).

51. Attached as **Exhibit 79** is a true and correct copy of the relevant portions of the Deposition

Transcript of Alex Wanish taken on October 27, 2023, in this case.

52. Attached as **Exhibit 81** is a true and correct copy of the unreported opinions cited in

Plaintiff's Response Brief Opposing City of Green Bay Defendants' Motion for Summary Judgment.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 28, 2024.

s/ Kevin G. Raasch  
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